

Aug. 13, 2019

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122  
Reply Comments

Dear Ms. Dortch:

Learfield IMG College writes to express its agreement with comments filed by various content distributors in response to the Commission's July 19 Public Notice in the above referenced docket.<sup>1</sup> Learfield IMG College depends on the highly reliable, extremely cost-effective C-band satellite service upon which video and audio content has been delivered in the United States for the past several decades. Put simply, the ACA Connects Coalition proposal is unworkable, unrealistic in timeline, and would directly impact and harm our business.

Learfield IMG College agrees with the Content Companies that the ACA Connects Coalition proposal "speculates, wrongly, that the Commission could, via regulatory mandate, overhaul the distribution of video and audio programming in the United States from a satellite-based system to one that relies almost exclusively on fiber—and for the most part in a mere '18 to 36 months.'"<sup>2</sup> The Content Companies are correct that the ACA Connects proposal "underestimates the complexity, timing, and cost that would be necessary to fundamentally change the video and audio distribution infrastructure" from satellite to fiber and that "even in a best-case scenario, the shift to a primarily fiber-based video and audio delivery system would take an unknown number of years to complete and cost far more than the estimated \$6 to \$7 billion dollars."<sup>3</sup> Additionally, ACA Connects proposal to become solely dependent upon fiber as the backbone of the delivery system, is not looking deep enough into the complexity of the rural country and the distinct inability to provide reliable fiber connectivity in these areas, and this has also been a historical struggle in the past 20 years!

Learfield IMG College believes that the Commission should not adopt a proposal that requires us, and the C-Band user community to move to a fiber-based distribution system, when the details are entirely speculative and incorrectly estimated. In conjunction, Learfield IMG College agrees with NAB that "forcing content providers to give up the ubiquitous, seamlessly reliable satellite distribution C-band spectrum provides in exchange for a massively complex, expensive and less

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<sup>1</sup> *Wireless Telecommunications Bureau, International Bureau, Office of Engineering and Technology, and Office of Economics and Analytics Seek Focused Additional Comments in 3.7-4.2 GHz Band Proceeding*, Public Notice, GN Docket No. 18-122, DA 19-678 (rel. July 19, 2019).

<sup>2</sup> Comments of the Content Companies, GN Docket No. 18-122 at 2 (Aug. 7, 2019).

<sup>3</sup> *Id.* at 2-3.

reliable fiber distribution network risks devastating harm to a vibrant content ecosystem on which hundreds of millions of Americans rely for the news, sports and entertainment programming they currently enjoy.”<sup>4</sup> Specifically, with regard to reliability, the “reduction in reliability” from C-band satellite distribution to fiber “would be completely unacceptable for video and audio content delivery services that reach millions of consumers at the same time.”<sup>5</sup>

Learfield IMG College also agrees with the C-Band Alliance that AT&T’s proposal for “unrestricted” terrestrial licenses in the C-band would fail to adequately protect FSS operations.<sup>6</sup> The C-Band Alliance provides evidence on the record that because of “fundamental satellite earth station antenna design,” “a 5G base station will cause blocking to the FSS earth station even at relatively large separation distances.”<sup>7</sup> Therefore, “unrestricted licenses as AT&T conceives them are simply not possible if FSS earth stations will continue to operate in the upper portion of the C-Band.”<sup>8</sup>

From the beginning of the FCC’s C-band inquiry, programmers and broadcasters have sought certainty regarding the operating environments for our businesses. Learfield IMG College agrees with the Content Companies that the proposal advocated by the C-Band Alliance is the only one that preserves the reliability of the existing C-band distribution system and fully protects our core satellite distribution of sports and state news business.<sup>9</sup> Learfield IMG College therefore urges the Commission to adopt the C-Band Alliance proposal.

Respectfully submitted,

/s/ Randy W. Williams  
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<sup>4</sup> Comments of the National Association of Broadcasters, GN Docket No. 18-122 at 2 (Aug. 7, 2019).

<sup>5</sup> Comments of the Content Companies at 6.

<sup>6</sup> Comments of the C-Band Alliance, GN Docket No. 18-122 at 21 (Aug. 7, 2019).

<sup>7</sup> *Id.* at 22.

<sup>8</sup> *Id.*

<sup>9</sup> Comments of the Content Companies at 15.